

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>09 - 155</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: <u>April 28, 2010</u></b>
<b>LUIS COLON,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "King Respect,"</b>	<b>:</b>	<b>18 U.S.C. § 1962(d) (conspiracy to</b>
<b>NEFTALI COLON,</b>	<b>:</b>	<b>participate in a racketeering enterprise -</b>
<b>a/k/a "King Nefti,"</b>	<b>:</b>	<b>1 count)</b>
<b>a/k/a "King Envy,"</b>	<b>:</b>	<b>18 U.S.C. § 1959(a)(1) (murder in aid of</b>
<b>OSCAR HERNANDEZ,</b>	<b>:</b>	<b>racketeering activity - 1 count)</b>
<b>a/k/a "King Flip,"</b>	<b>:</b>	<b>18 U.S.C. § 1959(a)(5) (conspiracy to</b>
<b>PEDRO VELASQUEZ,</b>	<b>:</b>	<b>commit murder in aid of racketeering</b>
<b>a/k/a "King P-Solo,"</b>	<b>:</b>	<b>activity - 3 counts)</b>
<b>MICHAEL PAGAN,</b>	<b>:</b>	<b>18 U.S.C. § 1959(a)(5) (conspiracy to</b>
<b>a/k/a "King Vision,"</b>	<b>:</b>	<b>commit kidnaping in aid of racketeering</b>
<b>ABRAN FIGUEROA,</b>	<b>:</b>	<b>activity - 1 count)</b>
<b>a/k/a "King Ace,"</b>	<b>:</b>	<b>18 U.S.C. § 1959(a)(1) (kidnaping in aid</b>
<b>JESSE ZAYAS,</b>	<b>:</b>	<b>of racketeering - 1 count)</b>
<b>a/k/a "King Pride,"</b>	<b>:</b>	<b>18 U.S.C. § 1959(a)(3) (assault with a</b>
<b>WALDEMAR TORRES,</b>	<b>:</b>	<b>dangerous weapon in aid of racketeering -</b>
<b>a/k/a "King Vail,"</b>	<b>:</b>	<b>1 count)</b>
<b>STEVE CALDERON,</b>	<b>:</b>	<b>18 U.S.C. § 924(c) (use and carrying of a</b>
<b>a/k/a "King Silence,"</b>	<b>:</b>	<b>firearm during and in relation to a crime</b>
<b>CESAR VELEZ,</b>	<b>:</b>	<b>of violence - 2 counts)</b>
<b>a/k/a "King C's"</b>	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (distribution of a</b>
<b>HECTOR LUIS RIVERA,</b>	<b>:</b>	<b>controlled substance - 11 counts)</b>
<b>a/k/a "King Tito,"</b>	<b>:</b>	<b>21 U.S.C. § 860(a) (distribution of a</b>
<b>CARLOS R. MARTINEZ,</b>	<b>:</b>	<b>controlled substance within 1,000 feet of a</b>
<b>a/k/a "King Knowledge"</b>	<b>:</b>	<b>public housing facility - 10 counts)</b>
	<b>:</b>	<b>21 U.S.C. § 846 (conspiracy to distribute</b>
	<b>:</b>	<b>methamphetamine - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 922(g)(1) (felon in possession</b>
	<b>:</b>	<b>of a firearm - 3 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 922(d)(1) (sale of a firearm to</b>
	<b>:</b>	<b>a known felon - 4 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

**UNDER SEAL**

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**SUPERSEDING INDICTMENT**

**COUNT ONE**

**CONSPIRACY TO PARTICIPATE IN A RACKETEERING (RICO) ENTERPRISE  
18 U.S.C. § 1962(d)**

**THE GRAND JURY CHARGES THAT:**

1. At various times relevant to this Superseding Indictment, defendants

**LUIS COLON,  
a/k/a “King Respect,”  
NEFTALI COLON,  
a/k/a “King Nefti,”  
a/k/a “King Envy,”  
OSCAR HERNANDEZ,  
a/k/a “King Flip,”  
PEDRO VELASQUEZ,  
a/k/a “King P-Solo,”  
MICHAEL PAGAN,  
a/k/a “King Vision,”  
ABRAN FIGUEROA,  
a/k/a “King Ace,”  
JESSE ZAYAS,  
a/k/a “King Pride,”  
WALDEMAR TORRES,  
a/k/a “King Vail,”  
STEVE CALDERON,  
a/k/a “King Silence,” and  
CESAR VELEZ,  
a/k/a “King C’s,”**

and others known and unknown to the grand jury, were members and associates of the Almighty Latin King and Queen Nation ("ALKQN"), a criminal organization whose members and associates engaged in narcotics distribution and acts of violence, including acts involving murder and kidnaping, and which operated in the Eastern District of Pennsylvania and elsewhere.

**THE ENTERPRISE**

At various times relevant to this superseding indictment:

2. The ALKQN, including its leadership, members, and associates, constituted an enterprise, as that term is defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate commerce, and functioned as follows:

3. The ALKQN was a national organization, headquartered in Chicago, Illinois, with state offices and local chapters throughout the United States. Local chapters reported to state offices which, in turn, reported to the national “Motherland” office of the ALKQN in Chicago, Illinois. The enterprise included members of the local Bethlehem chapter, known as the Bethlehem Sun Tribe of the ALKQN, and those state and national officers who, directly and indirectly, supervised, managed, and influenced those local members.

4. The ALKQN had officers for its state and local chapters, who created and enforced the rules of the ALKQN. At the local level, groups of Latin Kings were organized into “tribes,” which were generally based in a particular geographic area. Within each local chapter, or “tribe,” were officers including: “1st Crown,” known as “Inca” (the leader); “2nd Crown,” known as “Cacique”; “3rd Crown,” known as the “Chief Enforcer and Warlord”; “4th Crown,” who acted as “Treasurer”; “5th Crown,” who acted as “Secretary.” In addition to the “Crowns,” there were other officers as follows, “Head of Security,” also known as “Pearl,” who functioned as a bodyguard for the “Inca”; and “Crown Council Chairman,” who functioned as a “judge” at ALKQN “judicial proceedings.” State officers included “Inca,” (leader) and “Regional Officer.”

National “motherland” officers in Chicago included “regional officers,” who supervised the state offices and local chapters.

5. The ALKQN recruited male members, known as “Latin Kings,” and female members, known as “Latin Queens,” examined prospective members, required the memorization of rules, “prayers,” and codes of behavior and rituals contained in a written “manifesto,” and demanded of its members exclusive loyalty and absolute submission to the ALKQN and its leadership, as a condition of membership.

6. The ALKQN required its members to attend regular meetings, and to pay dues at these meetings, in order to fund the ALKQN by means of the legal and illegal activities of its members.

7. The ALKQN falsely held itself out to the public as a law-abiding, benevolent social group, and promoted this image through community parades, an internet web site, and other forms of false advertising and propaganda.

8. The ALKQN was an organization dedicated to committing offenses and violent crimes, including murder, attempted murder, assault and battery, kidnaping, and various drug trafficking crimes.

9. The Bethlehem Sun Tribe was the Bethlehem chapter of the ALKQN, and included those who exercised direct and indirect supervision of its members. To ensure obedience to the leadership of the enterprise, members of the enterprise learned, and agreed to be bound by, the rules and code of conduct of the enterprise, and of the ALKQN, and would enforce discipline among members who broke any of these rules.

## **PURPOSES OF THE ENTERPRISE**

The purposes of the ALKQN enterprise included the following:

10. Its members and associates obtained money and property for the enterprise by the payment of dues, and by committing criminal acts, including those acts listed in paragraph 16 of this Count, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere.

11. Its members and associates maintained, protected, and attempted to expand the power, territory and profits of the enterprise through the use of intimidation and violence.

12. To ensure obedience to the leadership of the enterprise, and to the ALKQN, its members and associates kept the enterprise's own members and associates, and others, including, but not limited to, the victims of their crimes, in fear of the enterprise and in fear of its members and associates through threats and acts of violence.

## **MANNER AND MEANS OF THE ENTERPRISE**

13.\_\_\_\_ The manner and means used by members of the enterprise to further its goals and achieve its purposes included the following:

a. Members of the enterprise learned and agreed to be bound by the rules and code of conduct of the enterprise, and of the ALKQN, and enforced discipline among members who broke these rules.

b. The enforcement of rules and the administration of discipline to any member who violated rules was achieved by bringing formal charges, convening tribunals and hearings, and executing punishment on violators.

c. Punishments for violations of rules included physical beatings,

torture, dismemberment, stabbing, shooting, burning, and murder. The “Incas” of the Bethlehem Sun Tribe and of the Pennsylvania office, ordered beatings by issuing “Beat-down On Sight” (BOS) orders, and ordered murders by issuing “Terminate On Sight” (TOS) orders.

d. Members wore black and gold clothing and paraphernalia, such as beads, commonly associated with the ALKQN, obtained tattoos bearing the name Latin Kings, bore and used the symbol of a crown, and communicated with phrases, slogans, and hand signals associated with the ALKQN.

e. Members created and used aliases and false identities, including “King” names for each member, in an attempt to obstruct justice, to mask the identities of criminal violators, and to otherwise further the goals of the enterprise.

f. Members held regular meetings, during which they discussed past events, planned future activities, and collected dues from members of the enterprise, which dues were to be paid to the state chapter, and, in turn, to the national headquarters of the ALKQN, and were otherwise used to further the criminal activities of the enterprise.

g. Members recruited other persons to become members of the ALKQN, and the Bethlehem Sun Tribe.

h. Members followed rules and regulations set forth in a written “Manifesto” provided by the national leadership of the ALKQN. These rules and regulations included the hierarchy of command within the ALKQN, the duty of loyalty to the ALKQN and obedience to its leadership, and the requirement to aid and assist fellow members of the ALKQN.

i. Members obtained, possessed, used, and carried firearms, during

and in relation to the commission of crimes to protect and expand the enterprise's territory, scope of criminal operations, and revenue.

j. Members distributed, sold, and possessed with intent to distribute controlled substances, primarily cocaine base ("crack"), but also methamphetamine, heroin and cocaine, in Bethlehem and elsewhere, the proceeds of which were used directly and indirectly to benefit the enterprise.

k. Members committed, conspired, attempted, and threatened to commit, acts of violence against other Latin Kings and Queens, rival gang members, and others to protect and expand the enterprise's territory, scope of criminal operations, and revenue.

l. Members preserved and protected the enterprise and its leadership by keeping its members and associates from cooperating with law enforcement, through intimidation, violence, threats of violence, and destruction of property.

#### **THE DEFENDANTS AND THEIR ROLES IN THE ENTERPRISE**

14. At times during the conspiracy, each of the defendants, listed below, were leaders, members and associates of the enterprise:

a. Defendant LUIS A. COLON, a/k/a "King Respect," was the First Crown (also known as the "Inca"), and the Head of the Crown Council, of the Bethlehem Sun Tribe of the ALKQN, and exercised direct authority over all Latin Kings in the Bethlehem Sun Tribe. He also served as a Regional Officer of the Pennsylvania Region of the ALKQN.

b. Defendant NEFTALI COLON, a/k/a "King Nefti," a/k/a "King Envy," held the position of Third Crown (Enforcer) of the Bethlehem Sun Tribe.

c. Defendants OSCAR HERNANDEZ, a/k/a “King Flip,” held the position of a crowned member of the Bethlehem Sun Tribe, and attended meetings of the organization, paid dues to the organization, and followed rules and orders of the organization and its leadership.

d. Defendant PEDRO VELASQUEZ, a/k/a “King P-Solo,” held the position of Second Crown (Cacique) of the Bethlehem Sun Tribe.

e. Defendant MICHAEL PAGAN, a/k/a “King Vision,” was a crowned member of the Bethlehem Sun Tribe and attended meetings of the organization, paid dues to the organization, and followed rules and orders of the organization and its leadership.

f. Defendant ABRAN FIGUEROA, a/k/a "King Ace," held the position of Fifth Crown (Secretary) of the Bethlehem Sun Tribe.

g. Defendant JESSE ZAYAS, a/k/a “King Pride,” held the position of First Crown (Inca) of the Bethlehem Sun Tribe.

h. Defendant WALDEMAR TORRES, a/k/a “King Vail,” held the position of Third Crown (Enforcer) of the Bethlehem Sun Tribe.

i. Defendant STEVE CALDERON, a/k/a “King Silence,” was a crowned member of the Bethlehem Sun Tribe and attended meetings of the organization, paid dues to the organization, and followed rules and orders of the organization and its leadership.

j. Defendant CESAR VELEZ, a/k/a “King C,” a/k/a “King C’s,” was a crowned member of the Bethlehem Sun Tribe and attended meetings of the organization, paid dues to the organization, and followed rules and orders of the organization and its leadership.



## **THE RACKETEERING CONSPIRACY**

15. From in or about 2001, through in or about February 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendants

**LUIS COLON,  
a/k/a “King Respect,”  
NEFTALI COLON,  
a/k/a “King Nefti,”  
a/k/a “King Envy,”  
OSCAR HERNANDEZ,  
a/k/a “King Flip,”  
PEDRO VELASQUEZ,  
a/k/a “King P-Solo,”  
MICHAEL PAGAN,  
a/k/a “King Vision,”  
ABRAN FIGUEROA,  
a/k/a “King Ace,”  
JESSE ZAYAS,  
a/k/a “King Pride,”  
WALDEMAR TORRES,  
a/k/a “King Vail,”  
STEVE CALDERON,  
a/k/a “King Silence,” and  
CESAR VELEZ,  
a/k/a “King C’s,”**

being persons employed by and associated with the ALKQN enterprise, as more fully described in paragraphs 1 through 15 of this count, which enterprise was engaged in, and the activities of which affected, interstate commerce, conspired and agreed, with each other, and with others known and unknown to the grand jury, to violate Title 18, United States Code, Section 1962(c), that is, to knowingly and unlawfully conduct and participate, directly and indirectly, in the conduct of the affairs of such enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which consisted of multiple acts involving:

- a. murder, which is chargeable under Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502, 306, and 903, of the laws of the Commonwealth of Pennsylvania;
- b. kidnaping, which is chargeable under Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2901, 306, and 903, of the laws of the Commonwealth of Pennsylvania;
- c. the trafficking of controlled substances, in violation of Title 21, United States Code, Sections 841, and 846;

16. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the enterprise's affairs.

### **OVERT ACTS**

In furtherance of the conspiracy, and to effect its objects and purposes, the defendants, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

#### **Background**

1. In or about 2001, Joseph Wallenberg, a/k/a "Smiley," charged elsewhere, was appointed Regional Officer for the Commonwealth of Pennsylvania by the national "Motherland" ALKQN office in Chicago, Illinois.

2. In or about 2001, Joseph Wallenberg, a/k/a "Smiley," was sent by the national "Motherland" ALKQN office to Pennsylvania to organize the various chapters of the Pennsylvania ALKQN, including the Philadelphia and Bethlehem chapters, under the rules and reporting systems of the national ALKQN.

3. In or about 2001, the Bethlehem Sun Tribe of the ALKQN consisted of approximately 12 members with defendant LUIS COLON, a/k/a "King Respect," serving as "First Crown."

4. In or about 2002, Joseph Wallenberg, a/k/a "Smiley," spoke with defendant LUIS COLON, a/k/a "King Respect," and the men agreed that the Bethlehem chapter of the ALKQN would begin reporting to the national ALKQN.

5. In or about 2002, Joseph Wallenberg, a/k/a "Smiley," traveled with William Sosa, a/k/a "King Homicide," charged elsewhere, who was then the First Crown of the Philadelphia chapter, to the Bethlehem residence of defendant LUIS COLON, a/k/a "King Respect," to meet with defendant COLON and the other leaders of the Bethlehem chapter.

6. In or about 2002, Joseph Wallenberg, a/k/a "Smiley," provided defendant LUIS COLON, a/k/a "King Respect," with the written manifesto containing the rules of the national ALKQN and they agreed that: (a) the Bethlehem chapter would report to the Philadelphia branch leadership, including when submitting monthly dues or the required 10% of proceeds of drug sales and when seeking authorization for beatings and killings; and (b) the Philadelphia branch would report to Wallenberg as the Regional Officer of Pennsylvania.

#### **The Saucon Park Murder**

7. On or about January 10, 2004, at Saucon Park in Bethlehem, defendants NEFTALI COLON, a/k/a "King Nefti," a/k/a "King Envy," OSCAR HERNANDEZ, a/k/a "King Flip," and Person # 1 known to the grand jury (Person # 1), shot and murdered a person known to the grand jury as Eugene Martinez, because Martinez had assaulted and disrespected defendant COLON and another member of the Bethlehem Sun Tribe of the ALKQN, hereafter referred to as the "Saucon Park murder."

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**Vineland, New Jersey Conspiracy to Murder**

8. On or about March 16, 2004, in Philadelphia, William Sosa, a/k/a "King Homicide," First Crown of the Philadelphia branch, issued an order to murder members of the New Jersey Latin Kings, known to the grand jury, and further ordered Latin Kings from Allentown and Bethlehem, Pennsylvania to serve as soldiers in a trip to the Vineland, New Jersey area, to murder members of the New Jersey Latin Kings.

9. On or about March 17, 2004, defendants LUIS COLON, a/k/a "King Respect," NEFTALI COLON, a/k/a "King Nefti," a/k/a "King Envy," OSCAR HERNANDEZ, a/k/a "King Flip," and PEDRO VELASQUEZ, a/k/a "King P-Solo," and other Latin Kings known and unknown to the grand jury, traveled to Vineland, New Jersey, armed with firearms, ammunition, and body armor, to attack and murder members of the New Jersey Latin Kings.

**Conspiracy to Murder A.R.**

10. In or about the Summer of 2004, defendant LUIS COLON, a/k/a "King Respect," told other people, including fellow Latin Kings, that an individual known to the grand jury as A.R., a/k/a "Ant," was a "snitch," based on defendant COLON's belief that A.R. was cooperating with law enforcement in the investigation of the Saucon Park murder.

11. On or about October 22, 2008, at a leadership meeting of the Bethlehem chapter of the ALKQN, defendants PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," WALDEMAR TORRES, a/k/a "King Vail," and STEVE CALDERON, a/k/a "King Silence," agreed to murder A.R., a/k/a "Ant," based on the defendants' belief that A.R. was cooperating with law enforcement in the investigation of the Saucon Park murder.

12. On or about October 23, 2008, defendants PEDRO VELASQUEZ, a/k/a

"King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," and STEVE CALDERON, a/k/a "King Silence," agreed to murder A.R., a/k/a "Ant," with each of the defendants agreeing to shoot A.R., thus making it impossible for any of them to later cooperate with law enforcement.

**Conspiracy to Kidnap and Assault C.F.**

13. On or about January 13, 2008, in Bethlehem, members of the Bethlehem Sun Tribe of the ALKQN, including but not limited to defendants PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," WALDEMAR TORRES, a/k/a "King Vail," and CESAR VELEZ, a/k/a "King C's," participated in a Tribe meeting in which they discussed their belief that C.F., a/k/a "Little Ricky," and I.S., a/k/a "Big Head Izzy," a/k/a "King Scar," each known to the grand jury, had provided information to law enforcement regarding criminal investigations involving members of the ALKQN.

14. On or about January 23, 2008, ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," WALDEMAR TORRES, a/k/a "King Vail," agreed to kidnap and assault an individual known to the grand jury as C.F., a/k/a "Little Ricky," based upon the defendants' belief that C.F. had cooperated with law enforcement in an investigation involving a member of the ALKQN.

15. On or about January 24, 2008, ABRAN FIGUEROA, a/k/a "King Ace," and WALDEMAR TORRES, a/k/a "King Vail," kidnaped C.F., a/k/a "Little Ricky," from his home and beat him, causing contusions and bruising, based upon the defendants' belief that C.F. had cooperated with law enforcement in an investigation involving a member of the ALKQN.

16. On or about January 27, 2008, in Bethlehem, members of the Bethlehem

Sun Tribe of the ALKQN, including but not limited to defendants LUIS COLON, a/k/a "King Respect," PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," and WALDEMAR TORRES, a/k/a "King Vail," participated in a Tribe meeting in which they discussed the January 24, 2008 beating of, and "stripping of the crown" from, C.F., a/k/a "Little Ricky," by defendants TORRES and FIGUEROA.

**Conspiracy to Murder I.S.**

17. On or about November 25, 2007, in Bethlehem, members of the Bethlehem Sun Tribe of the ALKQN, including but not limited to defendants LUIS COLON, a/k/a "King Respect," PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," WALDEMAR TORRES, a/k/a "King Vail," STEVE CALDERON, a/k/a "King Silence," and CESAR VELEZ, a/k/a "King C's," participated in a Tribe meeting in which they discussed their belief that I.S., a/k/a "Big Head Izzy," a/k/a "King Scar," had cooperated with law enforcement in an investigation involving a member of the ALKQN, and the need for the Tribe to deal with I.S. as a result of his cooperation.

18. On or about January 27, 2008, in Bethlehem, members of the Bethlehem Sun Tribe of the ALKQN, including but not limited to defendants LUIS COLON, a/k/a "King Respect," PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," and WALDEMAR TORRES, a/k/a "King Vail," participated in a Tribe meeting in which the participants discussed defendant ZAYAS's intention to kill I.S., a/k/a "Big Head Izzy," a/k/a

"King Scar" based on their belief that I.S. had cooperated with law enforcement in the Saucon Park murder investigation.

19. On or about January 28, 2008, defendant JESSE ZAYAS, a/k/a "King Pride," arranged to obtain a firearm to use in the planned murder of an individual known to the grand jury as I.S., a/k/a "Big Head Izzy," a/k/a "King Scar."

**The Punishment and Beating of Defendant JESSE ZAYAS, a/k/a "King Pride."**

20. On or about November 25, 2007, in Bethlehem, members of the Bethlehem Sun Tribe of the ALKQN, including but not limited to defendants LUIS COLON, a/k/a "King Respect," PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," WALDEMAR TORRES, a/k/a "King Vail," STEVE CALDERON, a/k/a "King Silence," and CESAR VELEZ, a/k/a "King C's," participated in a Tribe meeting in which the participants discussed and implemented punishments, known as "violations," for violation of Tribe rules, in terms of beatings given by participants to Tribe members, including a 90 second beating of defendant ZAYAS, a 90 second beating of defendant LUIS COLON, and a 3 minute beating of another Tribe member known to the grand jury whom the participants determined had taken \$600 from the Tribe's shared financial resources without permission.

**The Agreement to Beat an ALKQN Member for Stealing.**

21. On or about January 13, 2008, in Bethlehem, members of the Bethlehem Sun Tribe of the ALKQN, including but not limited to defendants PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," WALDEMAR TORRES, a/k/a "King Vail," and CESAR VELEZ, a/k/a "King C's," participated in a Tribe meeting in which the participants voted

to beat a member known to the grand jury and strip him of his membership in the Tribe for stealing money from Tribe's shared financial resources. The meeting participants also implemented a \$25 fine for Tribe members who report late to Tribe meetings.

**Discipline imposed on an ALKQN member.**

22. On or about March 22, 2008, in Bethlehem, members of the Bethlehem Sun Tribe of the ALKQN, including but not limited to defendants LUIS COLON, a/k/a "King Respect," PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," WALDEMAR TORRES, a/k/a "King Vail," STEVE CALDERON, a/k/a "King Silence," and CESAR VELEZ, a/k/a "King C's," participated in a Tribe meeting in which another member of the Bethlehem Sun Tribe known to the grand jury, was found in violation of the Tribe's rule prohibiting the recruiting of new members without authorization from the leadership and, as a penalty, he was ordered to attack two rival gang members whose identities are known to the grand jury.

**Additional Overt Acts in Furtherance of the Conspiracy**

23. On or about January 27, 2008, in Bethlehem, members of the Bethlehem Sun Tribe of the ALKQN, including but not limited to defendants LUIS COLON, a/k/a "King Respect," PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," and WALDEMAR TORRES, a/k/a "King Vail," participated in a Tribe meeting in which the participants paid monetary Tribe dues into a pooled financial "pot" for the collective benefit of the Tribe.

24. On or about March 16, 2008, in Bethlehem, members of the Bethlehem



Sun Tribe of the ALKQN, including but not limited to defendants LUIS COLON, a/k/a "King Respect," PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," WALDEMAR TORRES, a/k/a "King Vail," STEVE CALDERON, a/k/a "King Silence," and CESAR VELEZ, a/k/a "King C's," participated in a Tribe meeting in which: (a) the participants paid monetary Tribe dues into a pooled financial "pot"; (b) the participants discussed using the shared financial resources to provide "street loans" with exorbitant interest rates; (c) the participants discussed a proposed meeting of all the ALKQN chapters from throughout Pennsylvania; and (d) the participants discussed using the Tribe's pooled financial resources to pay for access to an on-line website to assist the Tribe in learning the criminal background of potential new recruits to the Tribe.

25. On or about September 7, 2008, in Bethlehem, members of the Bethlehem Sun Tribe of the ALKQN, including but not limited to defendants LUIS COLON, a/k/a "King Respect," PEDRO VELASQUEZ, a/k/a "King P-Solo," MICHAEL PAGAN, a/k/a "King Vision," ABRAN FIGUEROA, a/k/a "King Ace," WALDEMAR TORRES, a/k/a "King Vail," STEVE CALDERON, a/k/a "King Silence," participated in a Tribe meeting in which a recruit whose identity is known to the grand jury was "crowned" as a new member of the Bethlehem Sun Tribe in a ceremony in which the recruit swore loyalty to the Sun Tribe and black and gold beads were placed around his neck.

26. On or about November 10, 2009, a funeral service was held in Bethlehem for a known member of the Sun Tribe who had been murdered. Numerous members of the ALKQN attended the service, many wearing the black and gold colors of the ALKQN. Amongst the attendees were defendants LUIS COLON, a/k/a "King Respect," PEDRO VELASQUEZ,

a/k/a "King P-Solo," ABRAN FIGUEROA, a/k/a "King Ace," JESSE ZAYAS, a/k/a "King Pride," STEVE CALDERON, a/k/a "King Silence," and CESAR VELEZ, a/k/a "King C's."

**Distribution of Controlled Substances by Members of ALKQN**

27. On or about November 22, 2007, defendant PEDRO VELASQUEZ, a/k/a "King P-Solo," sold approximately 100 grams of cocaine in Bethlehem, Pennsylvania.

28. On or about November 29, 2007, defendant LUIS COLON, a/k/a "King Respect," sold approximately 6.1 grams of methamphetamine in Allentown, Pennsylvania.

29. On or about November 29, 2007, defendants PEDRO VELASQUEZ, a/k/a "King P-Solo," and LUIS COLON, a/k/a "King Respect," sold approximately 67 grams of crack cocaine in Bethlehem, Pennsylvania.

30. On or about December 13, 2007, defendant LUIS COLON, a/k/a "King Respect," sold approximately 55 grams of crack cocaine in Bethlehem, Pennsylvania.

31. On or about December 29, 2007, defendant PEDRO VELASQUEZ, a/k/a "King P-Solo," and another individual known to the grand jury, sold approximately 61 grams of crack cocaine in Bethlehem, Pennsylvania.

32. On or about January 31, 2008, defendants PEDRO VELASQUEZ, a/k/a "King P-Solo," and JESSE ZAYAS, a/k/a "King Pride," sold approximately 53 grams of crack cocaine in Bethlehem, Pennsylvania.

33. On or about February 27, 2008, defendants CESAR VELEZ, a/k/a "King C's," sold approximately 56 grams of crack cocaine in Bethlehem, Pennsylvania.

34. On or about March 14, 2008, defendants LUIS COLON, a/k/a "King Respect," and MICHAEL PAGAN, a/k/a "King Vision," sold approximately 6.7 grams of methamphetamine in Bethlehem, Pennsylvania.

35. On or about March 28, 2008, defendants LUIS COLON, a/k/a "King Respect," and MICHAEL PAGAN, a/k/a "King Vision," sold approximately 7.2 grams of methamphetamine in Bethlehem, Pennsylvania.

36. On or about May 2, 2008, defendants PEDRO VELASQUEZ, a/k/a "King P-Solo," and WALDEMAR TORRES, a/k/a "King Vail," sold approximately 61 grams of crack cocaine in Bethlehem, Pennsylvania.

37. On or about May 12, 2008, defendants LUIS COLON, a/k/a "King Respect," and MICHAEL PAGAN, a/k/a "King Vision," and another person known to the grand jury, agreed to retrieve 1,793 grams of methamphetamine from Philadelphia Airport and bring it to Bethlehem, Pennsylvania.

38. On or about February 2, 2010, defendant STEVE CALDERON, a/k/a "King Silence," sold approximately 60 grams of crack cocaine in Bethlehem, Pennsylvania.

**Sale of Firearms By and To Members of ALKQN**

39. On or about December 3, 2007, defendant CESAR VELEZ, a/k/a "King C's," sold a Taurus, Model PT945, .45 caliber firearm, loaded with eight rounds of live ammunition, to an individual known by the grand jury to be a member of the ALKQN.

40. On or about February 27, 2008, defendant CESAR VELEZ, a/k/a "King C's," sold a Bushmaster, model XM15-E2S. 223 caliber rifle, and 27 live rounds of ammunition, to an individual known by the grand jury to be a member of the ALKQN.

41. On or about March 15, 2008, defendant ABRAN FIGUEROA, a/k/a "King Ace," and another person known to the grand jury, sold a Colt, .45 caliber firearm, and 19 live rounds of Hydra Shock .45 caliber ammunition, to an individual known by the grand jury to be a member of the ALKQN.

42. On or about April 2, 2008, defendant CESAR VELEZ, a/k/a "King C's," sold a Bushmaster, model XM15, .223 caliber rifle, to an individual known by the grand jury to be a member of the ALKQN.

43. On or about April 11, 2008, defendant ABRAN FIGUEROA, a/k/a "King Ace," and another person known to the grand jury, sold one Colt, Model C95040, .45 caliber handgun, loaded with eight live rounds of ammunition, and one Remington, Model 1911, .45 caliber handgun, to an individual known by the grand jury to be a member of the ALKQN.

44. On or about May 30, 2008, defendant CESAR VELEZ, a/k/a "King C's," sold Norinco, model 56S, 7.62 caliber rifle, and 1,120 rounds of live ammunition, to an individual known by the grand jury to be a member of the ALKQN.

45. On or about August 26, 2008, defendant CESAR VELEZ, a/k/a "King C's," sold a Colt, Model Government, .45 caliber pistol, to an individual known by the grand jury to be a member of the ALKQN.

All in violation of Title 18, United States Code, Section 1962(d).

#### **NOTICE OF SPECIAL SENTENCING FACTORS**

17. The allegations and facts set forth in this Notice of Special Sentencing Factors relate to Count 1 of this Superseding Indictment.

18. Beginning on or about November 22, 2007, and continuing through and including on or about the date of the return of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of Pennsylvania, and elsewhere, defendants

**LUIS COLON,  
a/k/a "King Respect,"  
PEDRO VELASQUEZ,**

**a/k/a "King P-Solo,"  
WALDEMAR TORRES,  
a/k/a "King Vail,"  
STEVE CALDERON,  
a/k/a "King Silence," and  
CESAR VELEZ,  
a/k/a "King C's,"**

knowingly and intentionally conspired to distribute, and to possess with intent to distribute, a controlled substance, which offense involved 50 grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"). All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

19. Beginning on or about March 28, 2008, and continuing through and including on or about the date of the return of this Superseding Indictment, both dates being approximate and inclusive, within the Eastern District of Pennsylvania, and elsewhere, defendants

**LUIS COLON,  
a/k/a "King Respect," and  
MICHAEL PAGAN,  
a/k/a "King Vision,"**

knowingly and intentionally conspired to distribute, and to possess with intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine ("actual"). In violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

20. On or about January 10, 2004, in the Eastern District of Pennsylvania, defendants

**NEFTALI COLON,  
a/k/a "King Nefti,"  
a/k/a "King Envy," and  
OSCAR HERNANDEZ,  
a/k/a "King Flip,"**

intentionally, knowingly, recklessly and negligently caused the death of another human being. In violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 306 and 2502.

21. On or about January 24, 2008, in the Eastern District of Pennsylvania, defendants

**ABRAN FIGUEROA,  
a/k/a "King Ace," and  
WALDEMAR TORRES,  
a/k/a "King Vail,"**

unlawfully removed another a substantial distance, and unlawfully confining another for a substantial period, with intent to either facilitate the commission of any felony, or to inflict bodily injury on, or to terrorize the victim or another, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 306 and 2901.

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**COUNT TWO**

**MURDER IN AID OF RACKETEERING**

**18 U.S.C. § 1959(a)(1)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 15, and Overt Act 7 of Count One of this superseding indictment are incorporated here.
2. The Almighty Latin King and Queen Nation ("ALKQN") , including the Bethlehem Sun Tribe, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.
3. The ALKQN was engaged in racketeering activity, including acts and threats involving murder, kidnaping, and dealing in controlled substances.
4. On or about January 10, 2004, in Bethlehem, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**NEFTALI COLON,  
a/k/a "King Nefti,"  
a/k/a "King Envy," and  
OSCAR HERNANDEZ,  
a/k/a "King Flip,"**

together with Person # 1 known to the grand jury, committed, and aided and abetted the commission of, the knowing and intentional murder of Eugene Martinez, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 306 and 2502.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

**COUNT THREE**

**USING AND CARRYING A FIREARM DURING A VIOLENT CRIME**

**18 U.S.C. § 924(c)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 15, and Overt Act 7 of Count One and Paragraph 2 of Count Two of this superseding indictment are incorporated here.

2. From on or about January 10, 2004, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendants

**NEFTALI COLON  
a/k/a “King Envy,” and  
OSCAR HERNANDEZ,  
a/k/a “King Flip,”**

together and with Person # 1 known to the grand jury, knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a .40 caliber handgun, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, murder in aid of racketeering, in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii), and 2.



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**COUNT FOUR**

**CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING**

**18 U.S.C. § 1959(a)(5)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 15, and Overt Act 8 and 9 of Count One of this superseding indictment are incorporated here.
2. The Almighty Latin King and Queen Nation (“ALKQN”), including the Bethlehem Sun Tribe, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.
3. The ALKQN was engaged in racketeering activity, including acts and threats involving murder, kidnaping, and dealing in controlled substances.
4. From on or about March 17, 2004, through on or about March 18, 2004, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

**NEFTALI COLON  
a/k/a “King Envy,”  
LUIS A. COLON,  
a/k/a “King Respect,”  
OSCAR HERNANDEZ,  
a/k/a “King Flip,”  
PEDRO VELASQUEZ,  
a/k/a “King P-Solo,”  
HECTOR LUIS RIVERA,  
a/k/a “King Tito,” and  
CARLOS R. MARTINEZ,  
a/k/a “King Knowledge,”**

conspired and agreed, together and with others known and unknown to the grand jury, to

knowingly and intentionally murder persons known to the grand jury as members of the New Jersey chapter of the ALKQN, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

**COUNT FIVE**

**USING AND CARRYING A FIREARM DURING A VIOLENT CRIME**

**18 U.S.C. § 924(c)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 15, and Overt Act 8 and 9 of Count One and Paragraph 2 of Count Two of this superseding indictment are incorporated here.
2. From on or about March 17, 2004, through on or about March 18, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendants

**NEFTALI COLON  
a/k/a “King Envy,”  
LUIS A. COLON,  
a/k/a “King Respect,”  
OSCAR HERNANDEZ,  
a/k/a “King Flip,”  
PEDRO VELASQUEZ,  
a/k/a “King P-Solo,”  
HECTOR LUIS RIVERA,  
a/k/a “King Tito,” and  
CARLOS R. MARTINEZ  
a/k/a “King Knowledge,”**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, handguns, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit murder in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(5).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii), and 2.

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**COUNT SIX**

**CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING**

**18 U.S.C. § 1959(a)(5)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 15, and Overt Act 17 through 19 of Count One of this superseding indictment are incorporated here.

2. The Almighty Latin King and Queen Nation ("ALKQN") , including the Bethlehem Sun Tribe, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

3. The ALKQN was engaged in racketeering activity, including acts and threats involving murder, kidnaping, and dealing in controlled substances.

4. On or about November 25, 2007, through January 2008, in Bethlehem, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**LUIS COLON,  
a/k/a "King Respect,"  
PEDRO VELASQUEZ,  
a/k/a "King P-Solo,"  
MICHAEL PAGAN,  
a/k/a "King Vision,"  
ABRAN FIGUEROA,  
a/k/a "King Ace,"  
JESSE ZAYAS,  
a/k/a "King Pride,"  
WALDEMAR TORRES,  
a/k/a "King Vail," and  
CESAR VELEZ,  
a/k/a "King C's,"**

conspired and agreed, together and with others unknown to the grand jury, to knowingly and intentionally murder a person known to the grand jury as I.S., a/k/a “Big Head Izzy,” a/k/a “King Scar,” in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

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**COUNT SEVEN**

**CONSPIRACY TO COMMIT KIDNAPING IN AID OF RACKETEERING**

**18 U.S.C. § 1959(a)(5)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 15, and Overt Act 13 through 16 of Count One of this superseding indictment are incorporated here.

2. The Almighty Latin King and Queen Nation ("ALKQN"), including the Bethlehem Sun Tribe, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

3. The ALKQN was engaged in racketeering activity, including acts and threats involving murder, kidnaping, and dealing in controlled substances.

4. From on or about January 13, 2008 through January 24, 2008, in Bethlehem, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**PEDRO VELASQUEZ,  
a/k/a "King P-Solo,"  
ABRAN FIGUEROA,  
a/k/a "King Ace,"  
JESSE ZAYAS,  
a/k/a "King Pride," and  
WALDEMAR TORRES,  
a/k/a "King Vail,"**

conspired and agreed, together and with others unknown to the grand jury, to knowingly and intentionally kidnap C.F., a/k/a "Little Ricky," this is, to remove him a substantial distance and confine him, for a substantial time, with intent to inflict bodily injury upon C.F., in violation of

the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2901 and 903.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

**COUNT EIGHT**

**ASSAULT WITH A DANGEROUS WEAPON IN AID OF RACKETEERING**

**18 U.S.C. § 1959(a)(3)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 15, and Overt Act 13 through 16 of Count One of this superseding indictment are incorporated here.

2. The Almighty Latin King and Queen Nation ("ALKQN") , including the Bethlehem Sun Tribe, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

3. The ALKQN was engaged in racketeering activity, including acts and threats involving murder, kidnaping, and dealing in controlled substances.

4. On or about January 24, 2008, in Bethlehem, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**ABRAN FIGUEROA,  
a/k/a "King Ace," and  
WALDEMAR TORRES,  
a/k/a "King Vail,"**

knowingly and intentionally assaulted, and aided and abetted the assault of, C.F., a/k/a "Little Ricky," with a dangerous weapon, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2702(a)(4) and 306.

All in violation of Title 18, United States Code, Section 1959(a)(3) and 2.



**COUNT NINE**

**KIDNAPING IN AID OF RACKETEERING**

**18 U.S.C. § 1959(a)(1)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 15, and Overt Act 13 through 16 of Count One of this superseding indictment are incorporated here.

2. The Almighty Latin King and Queen Nation ("ALKQN"), including the Bethlehem Sun Tribe, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

3. The ALKQN was engaged in racketeering activity, including acts and threats involving murder, kidnaping, and dealing in controlled substances.

4. On or about January 24, 2008, in Bethlehem, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**ABRAN FIGUEROA,  
a/k/a "King Ace," and  
WALDEMAR TORRES,  
a/k/a "King Vail,"**

knowingly and intentionally kidnaped, and aided and abetted the kidnaping of C.F., a/k/a "Little Ricky," in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2901 and 306.

All in violation of Title 18, United States Code, Section 1959(a)(1) and 2.

**COUNT TEN**

**CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING**

**18 U.S.C. § 1959(a)(5)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 15, and Overt Acts 10 through 12 of Count One of this superseding indictment are incorporated here.

2. The Almighty Latin King and Queen Nation ("ALKQN"), including the Bethlehem Sun Tribe, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

3. The ALKQN was engaged in racketeering activity, including acts and threats involving murder, kidnaping, and dealing in controlled substances.

4. From on or about October 22, 2008 through October 23, 2008, in Bethlehem, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**PEDRO VELASQUEZ,  
a/k/a "King P-Solo,"  
MICHAEL PAGAN,  
a/k/a "King Vision,"  
WALDEMAR TORRES,  
a/k/a "King Vail," and  
STEVE CALDERON,  
a/k/a "King Silence,"**

conspired and agreed, together and with others unknown to the grand jury, to knowingly and intentionally murder of A.R., a/k/a "Ant," in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and

2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 22, 2007, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**PEDRO VELASQUEZ,  
a/k/a “King P-Solo,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 22, 2007, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**PEDRO VELASQUEZ,  
a/k/a “P-Solo,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount  
of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising  
the Parkridge Housing Development, a housing facility owned by a public housing authority,  
located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States  
Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

**COUNT THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 29, 2007, in Bethlehem, in the Eastern District of Pennsylvania, defendants

**LUIS COLON,  
a/k/a "King Respect," and  
PEDRO VELASQUEZ,  
a/k/a "King P-Solo,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 67 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 29, 2007, in Bethlehem, in the Eastern District of Pennsylvania, defendants

**LUIS COLON,  
a/k/a "King Respect," and  
PEDRO VELASQUEZ,  
a/k/a "King P-Solo,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 67 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkridge Housing Development, a housing facility owned by a public housing authority, located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

**COUNT FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 29, 2007, in Allentown, in the Eastern District of  
Pennsylvania, defendant

**LUIS COLON,  
a/k/a “King Respect,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of  
methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).



**COUNT SIXTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 3, 2007, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**CESAR VELEZ,  
a/k/a "King C's,"**

knowingly sold a firearm, that is, a Taurus, Model PT945, .45 caliber handgun, serial number NR167009, loaded with eight live rounds of ammunition to a person known to the grand jury ("buyer"), knowing and having reasonable cause to believe that the buyer had been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

**COUNT SEVENTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 13, 2007, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**LUIS COLON,  
a/k/a “King Respect,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 55 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT EIGHTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 13, 2007, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**LUIS COLON,  
a/k/a "King Respect,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 55 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkridge Housing Development, a housing facility owned by a public housing authority, located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT NINETEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 29, 2007, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**PEDRO VELASQUEZ,  
a/k/a “King P-Solo,”**

knowingly and intentionally distributed 50 grams or more, that is, approximately 61 grams, of a  
mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II  
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**COUNT TWENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 29, 2007, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**PEDRO VELASQUEZ,  
a/k/a "King P-Solo,"**

knowingly and intentionally distributed 50 grams or more, that is, approximately 61 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkridge Housing Development, a housing facility owned by a public housing authority, located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 860(a).

**COUNT TWENTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 31, 2008, in Bethlehem, in the Eastern District of Pennsylvania, defendants

**PEDRO VELASQUEZ,  
a/k/a “King P-Solo,” and  
JESSE ZAYAS,  
a/k/a “King Pride,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 53 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT TWENTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 31, 2008, in Bethlehem, in the Eastern District of Pennsylvania, defendants

**PEDRO VELASQUEZ,  
a/k/a "King P-Solo," and  
JESSE ZAYAS,  
a/k/a "King Pride,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 53 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkridge Housing Development, a housing facility owned by a public housing authority, located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT TWENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 27, 2008, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**CESAR VELEZ,  
a/k/a “King C’s,”**

knowingly and intentionally distributed 50 grams or more, that is, approximately 56 grams, of a  
mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II  
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).



**COUNT TWENTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 27, 2008, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**CESAR VELEZ,  
a/k/a "King C's,"**

knowingly and intentionally distributed 50 grams or more, that is, approximately 56 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkridge Housing Development, a housing facility owned by a public housing authority, located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 860(a).

**COUNT TWENTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 27, 2008, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**CESAR VELEZ,  
a/k/a "King C's,"**

knowingly sold a firearm, that is a Bushmaster, model XM15-E2S. 223 caliber rifle, serial number BF1485048, with twenty-seven rounds of live ammunition, to a person known to the grand jury ("buyer"), knowing and having reasonable cause to believe that the buyer had been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

**COUNT TWENTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 14, 2008, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**LUIS COLON,  
a/k/a "King Respect," and  
MICHAEL PAGAN,  
a/k/a "King Vision,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 6.7 grams, of methamphetamine ("actual"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT TWENTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 14, 2008, in Bethlehem, in the Eastern District of  
Pennsylvania, defendants

**LUIS COLON,  
a/k/a "King Respect," and  
MICHAEL PAGAN,  
a/k/a "King P-Solo,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 6.7 grams, of methamphetamine ("actual"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkridge Housing Development, a housing facility owned by a public housing authority, located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

In violation of Title 21, United States Code, Section 860(a).

**COUNT TWENTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 15, 2008, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**ABRAN FIGUEROA,  
a/k/a "King Ace,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Colt, .45 caliber handgun, serial number 83684B70, and nineteen live rounds of .45 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWENTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 28, 2008, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**LUIS COLON,  
a/k/a "King Respect," and  
MICHAEL PAGAN,  
a/k/a "King Vision,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 7.2 grams, of methamphetamine ("actual"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT THIRTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 28, 2008, in Bethlehem, in the Eastern District of  
Pennsylvania, defendants

**LUIS COLON,  
a/k/a "King Respect," and  
MICHAEL PAGAN,  
a/k/a "King P-Solo,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 7.2 grams, of methamphetamine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkridge Housing Development, a housing facility owned by a public housing authority, located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT THIRTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 2, 2008, in Bethlehem, in the Eastern District of Pennsylvania,  
defendant

**CESAR VELEZ,  
a/k/a "King C's,"**

knowingly sold a firearm, that is a Bushmaster, model XM15, .223 caliber rifle, serial number L406038, to a person known to the grand jury ("buyer"), knowing and having reasonable cause to believe that the buyer had been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).



**COUNT THIRTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 11, 2008, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**ABRAN FIGUEROA,  
a/k/a "King Ace,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce firearms, that is, one Colt, Model C95040, .45 caliber handgun, serial number C95040, loaded with eight live rounds of ammunition, and one Remington, Model 1911, .45 caliber handgun, serial number 1551873.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THIRTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 2, 2008, in Bethlehem, in the Eastern District of Pennsylvania,  
defendants

**PEDRO VELASQUEZ,  
a/k/a “King P-Solo,” and  
WALDEMAR TORRES,  
a/k/a “King Vail,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 61 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT THIRTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 2, 2008, in Bethlehem, in the Eastern District of Pennsylvania,  
defendants

**PEDRO VELASQUEZ,  
a/k/a “King P-Solo,” and  
WALDEMAR TORRES,  
a/k/a “King Vail,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 61 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkridge Housing Development, a housing facility owned by a public housing authority, located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT THIRTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

From at least on or about May 12, 2008, in Bethlehem, Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**LUIS COLON,  
a/k/a "King Respect," and  
MICHAEL PAGAN,  
a/k/a "King Vision,"**

and another person known to the grand jury, conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute and possess with intent to distribute 500 grams or more, that is approximately 1,793 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

**COUNT THIRTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 30, 2008, in Bethlehem, in the Eastern District of Pennsylvania,  
defendant

**CESAR VELEZ,  
a/k/a "King C's,"**

knowingly sold a firearm, that is a Norinco, model 56S, 7.62 caliber rifle, serial number 513990,  
and 1,120 rounds of live ammunition, to a person known to the grand jury ("buyer"), knowing  
and having reasonable cause to believe that the buyer had been convicted of a crime punishable  
by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

**COUNT THIRTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 26, 2008, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**CESAR VELEZ,  
a/k/a "King C's,"**

knowingly sold a firearm, that is a Colt, Model Government, .45 caliber pistol, serial number 87039G70, to a person known to the grand jury ("buyer"), knowing and having reasonable cause to believe that the buyer had been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

**COUNT THIRTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 2, 2010, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**STEVE CALDERON,  
a/k/a "King Silence,"**

knowingly and intentionally distributed 50 grams or more, that is, approximately 60 grams, of a  
mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II  
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**COUNT THIRTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 2, 2010, in Bethlehem, in the Eastern District of  
Pennsylvania, defendant

**STEVE CALDERON,  
a/k/a "King Silence,"**

knowingly and intentionally distributed 50 grams or more, that is, approximately 60 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkridge Housing Development, a housing facility owned by a public housing authority, located at 1948 Hillcrest Road in Bethlehem, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 860(a).



## NOTICE OF FORFEITURE

### THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1962(d), and Title 21, United States Code, Sections 846, 841(a)(1), and 860(a), set forth in this superseding indictment, defendants

**LUIS COLON,  
a/k/a "King Respect,"  
NEFTALI COLON,  
a/k/a "King Nefti,"  
a/k/a "King Envy,"  
OSCAR HERNANDEZ,  
a/k/a "King Flip,"  
PEDRO VELASQUEZ,  
a/k/a "King P-Solo,"  
MICHAEL PAGAN,  
a/k/a "King Vision,"  
ABRAN FIGUEROA,  
a/k/a "King Ace,"  
JESSE ZAYAS,  
a/k/a "King Pride,"  
WALDEMAR TORRES,  
a/k/a "King Vail,"  
STEVE CALDERON,  
a/k/a "King Silence,"  
CESAR VELEZ,  
a/k/a "King C's"  
HECTOR LUIS RIVERA,  
a/k/a "King Tito," and  
CARLOS R. MARTINEZ,  
a/k/a "King Knowledge"**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

3. As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), set forth in this superseding indictment, defendants

**LUIS COLON,**  
**a/k/a "King Respect,"**  
**NEFTALI COLON,**  
**a/k/a "King Nefti,"**  
**a/k/a "King Envy,"**  
**OSCAR HERNANDEZ,**  
**a/k/a "King Flip,"**  
**PEDRO VELASQUEZ,**  
**a/k/a "King P-Solo,"**  
**MICHAEL PAGAN,**  
**a/k/a "King Vision,"**  
**ABRAN FIGUEROA,**  
**a/k/a "King Ace,"**  
**JESSE ZAYAS,**  
**a/k/a "King Pride,"**  
**WALDEMAR TORRES,**  
**a/k/a "King Vail,"**  
**STEVE CALDERON,**  
**a/k/a "King Silence,"**

**CESAR VELEZ,  
a/k/a "King C's"  
HECTOR LUIS RIVERA,  
a/k/a "King Tito," and  
CARLOS R. MARTINEZ,  
a/k/a "King Knowledge,"**

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offenses, including, but not limited to:

- (1) Smith and Wesson, 9mm handgun, S/N TET2801, loaded with 15 rounds;
- (2) Ruger, .45 caliber handgun, S/N 661-97706, loaded with seven hollow point rounds;
- (3) Smith and Wesson, .38 caliber handgun, 5-shot, Model # 925, S/N AE102036, loaded with five rounds;
- (4) Jennings, Model J22, .22 caliber handgun, S/N 750861, loaded with five rounds;
- (5) Bryco Arms, 9mm handgun, Model Jennings Nine, S/N 135545, loaded with 12 rounds;
- (6) Savage Arms, .22 caliber rifle, Stevens Model 62, S/N 0192147, and a box of 50, .22 caliber, rimfire, cartridges;
- (7) Taurus, Model PT945, .45 caliber handgun, serial number NR167009, with eight live rounds of ammunition;
- (8) Bushmaster, model XM15-E2S, .223 caliber rifle, serial number BF1485048, with 27 rounds of live ammunition;
- (9) Colt, .45 caliber handgun, serial number 83684B70, with nineteen live rounds of .45 caliber ammunition;

- (10) Bushmaster, model XM15, .223 caliber rifle, serial number L406038;
- (11) Colt, Model C95040, .45 caliber handgun, serial number C95040, with eight live rounds of ammunition;
- (12) Remington, Model 1911, .45 caliber handgun, serial number 1551873;
- (13) Norinco, model 56S, 7.62 caliber rifle, serial number 513990, with 1,120 rounds of live ammunition; and
- (14) Colt, Model Government, .45 caliber pistol, serial number 87039G70.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**MICHAEL L. LEVY**  
**United States Attorney**